

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Case No.: 1:25-cv-20757-JB/Torres**

JANE DOE,
Plaintiff,

v.

STEVEN K. BONNELL II,
Defendant.

**DEFENDANT STEVEN K. BONNELL II'S MOTION FOR LEAVE TO FILE
CERTAIN DOCUMENTS UNDER SEAL**

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Defendant Steven K. Bonnell II (“Bonnell”), pursuant to Southern District of Florida Rule 5.4 and Paragraph 12 of the Protective Order Governing Discovery [D.E. 116], respectfully requests leave of Court to file certain unredacted versions of documents under seal, and states as follows in support:

1. On December 1, 2025, Bonnell filed a Motion for Sanctions Pursuant to Fed. R. Civ. P. 11 against Plaintiff based on a false and defamatory allegation in Plaintiff’s Opposition to Bonnell’s Motion to Dismiss that Bonnell exchanged sexually explicit materials with a minor. [D.E. 183].

2. Bonnell’s Motion for Sanctions and attachments thereto¹ rely on deposition testimony of a non-party who was portrayed on certain online platforms as “Rose” (hereafter, “Non-Party”).

3. Plaintiff has designated Non-Party’s entire deposition transcript as “Confidential” pursuant to the Protective Order Governing Discovery.

4. Bonnell agrees that Non-Party’s identifying information (i.e., legal name) is properly designated as “Confidential” pursuant to the Protective Order Governing Discovery, but disputes Plaintiff’s blanket designation of Non-Party’s entire deposition transcript as “Confidential”.

5. The parties have been unable to resolve this dispute; accordingly, Plaintiff, as the proponent of confidentiality of Non-Party’s entire deposition transcript, must comply with Paragraph 17 of the Protective Order Governing Discovery and move the Court for a ruling as to

¹ Specifically, the Declaration of Andrew B. Brettler in Support of Bonnell’s Motion for Sanctions [D.E. 183-1], Exhibit A to Declaration, the October 23, 2025 Deposition Transcript of Non-Party [D.E. 183-2], Exhibit B to Declaration, Bonnell’s October 30, 2025 Correspondence to Plaintiff regarding Non-Party’s deposition testimony [D.E. 183-3], and Exhibit C to Declaration, Bonnell’s November 7, 2025 Rule 11 Safe Harbor Correspondence to Plaintiff [D.E. 183-4].

whether Non-Party's entire deposition transcript may be properly treated as "Confidential".

6. As of the filing of Bonnell's Motion for Sanctions, Plaintiff had not yet moved the Court for such a ruling.

7. To comply with the current-but-disputed "Confidential" designation of Non-Party's entire deposition transcript, Bonnell filed redacted versions of his Motion for Sanctions and attachments thereto that concealed Non-Party's testimony (as well as Non-Party's legal name).

8. Non-Party's deposition testimony is central to Bonnell's Motion for Sanctions. Bonnell therefore respectfully requests leave of Court to file unredacted versions of his Motion for Sanctions and attachments thereto so that the Court can fully consider the Motion for Sanctions.

9. Bonnell proposes that the unredacted versions of the Motion for Sanctions and attachments thereto remain under seal until the Court has ruled on Plaintiff's forthcoming motion as to whether Non-Party's entire deposition transcript is properly treated as "Confidential". If the Court finds that Non-Party's entire deposition transcript is not properly treated as "Confidential", the Court should authorize Bonnell to file versions of his Motion for Sanctions and attachments thereto that redact only Non-Party's legal name and not Non-Party's deposition testimony.

WHEREFORE, Defendant Steven K. Bonnell II respectfully requests the Court grant him leave to file under seal unredacted versions of his Motion For Sanctions Pursuant to Fed. R. Civ. P. 11 [D.E. 183], the Declaration of Andrew B. Brettler in Support of Bonnell's Motion for Sanctions [D.E. 183-1], Exhibit A to Declaration, the October 23, 2025 Deposition Transcript of Non-Party [D.E. 183-2], Exhibit B to Declaration, Bonnell's October 30, 2025 Correspondence to Plaintiff regarding Non-Party's deposition testimony [D.E. 183-3], and Exhibit C to Declaration, Bonnell's November 7, 2025 Rule 11 Safe Harbor Correspondence to Plaintiff [D.E. 183-4] and award any further relief the Court deems just and proper.

LOCAL RULE 7.1(a)(2) CERTIFICATE OF CONFERRAL

WE HEREBY CERTIFY that on December 2, 2025, undersigned counsel for movant conferred with counsel for Plaintiff regarding the relief sought in this Motion, and Plaintiff's counsel indicated they took no position on the relief requested.

Dated: December 5, 2025

Respectfully submitted,

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Counsel for Steven K. Bonnell II

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 5, 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record, including those listed in the below Service List, via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Patricia M. Patino

Attorney

SERVICE LIST

Jane Doe v. Steven K. Bonnell II
Case No.: 1:25-cv-20757-JB

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